Dear Quin,

6/16/78

This is not an appeal. It is for your information.

I read these records yesterday and prepared this memo this morning, to file with the records and for Jim's information.

However, once again I believe there is an illustration of bad and costly policy and practise under FOIA.

There never was any need to withhold any of these records.

Even if exempt, even if there was an excuse for referring them around.

But the amount of work and cost alone must be considerable.

You or others in the Department can do their own arithmetic, but unless this is quite exceptional it must have accumulated, with other such instances, into a very large hunk of Government money.

From my experiences it is not at all exceptional.

I believe this also illustrates how the machinery is designed to permit avoidance of compliance on appeal. If I had not obatined the worksheets and was not in a position to go over them and list all withholdings, there would be no way of knowing that these records had been withheld.

If the records themselves are not before the appeals authority the appeals authority has no way of knowing they were withheld and no way of acting either way on the withholding.

Best wishes,